

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                    |   |                        |
|------------------------------------|---|------------------------|
| DOROTHY GAUTREAUX, et al.,         | ) |                        |
|                                    | ) |                        |
| Plaintiffs,                        | ) | Case Number: 66 C 1459 |
|                                    | ) |                        |
| v.                                 | ) |                        |
|                                    | ) |                        |
| CHICAGO HOUSING AUTHORITY, et al., | ) | Hon. Marvin E. Aspen   |
|                                    | ) |                        |
| Defendants.                        | ) |                        |

**NOTICE OF FILING**

PLEASE TAKE NOTICE that on November 28, 2023, Defendant, Chicago Housing Authority, has filed in the Northern District of Illinois in Room 2568 at 219 S. Dearborn Street, Chicago, IL, the attached **Joint Motion of Plaintiffs and Defendant Chicago Housing Authority For An Order Approving Agreement of The Parties Respecting Payment of Plaintiffs' Attorney's Fees**, and the proposed order, a copy of which is herewith served upon you.

Respectfully submitted,

Dated: November 28, 2023

/s/ Elizabeth M. Silas  
\_\_\_\_\_  
Elizabeth M. Silas  
One of the Attorneys for Chicago Housing  
Authority

Ellen M. Harris  
Elizabeth M. Silas  
Chicago Housing Authority  
60 E. Van Buren St., 12<sup>th</sup> Floor  
Chicago, Illinois 60605  
312-913-7116  
312-913-7090

**CERTIFICATE OF SERVICE**

I, Elizabeth M. Silas, an attorney, certify that on November 28, 2023, I caused copies of the foregoing Notice and Joint Motion to be served upon the persons whose names below:

Cara Hendrickson  
Julie Elena Brown  
Impact for Equity (formerly known as  
Business and Professional People  
for the Public Interest)  
25 East Washington Street, Suite 1515  
Chicago, IL 60602  
(312) 759-8261

/s/ Elizabeth M. Silas

Elizabeth M. Silas

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| DOROTHY GAUTREAUX, <i>et al.</i> ,         | ) |                      |
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| Plaintiffs,                                | ) |                      |
|  | ) |                      |
| v.   | ) | No. 66 C 1459        |
|  | ) |                      |
|  | ) | Hon. Marvin E. Aspen |
| CHICAGO HOUSING AUTHORITY, <i>et al.</i> , | ) |                      |
|  | ) |                      |
| Defendant.                                 | ) |                      |

**JOINT MOTION OF PLAINTIFFS AND  
DEFENDANT CHICAGO HOUSING AUTHORITY  
FOR AN ORDER APPROVING AGREEMENT  
OF THE PARTIES RESPECTING PAYMENT OF  
PLAINTIFFS' ATTORNEYS' FEES**

Plaintiffs and Defendant Chicago Housing Authority (“CHA”), by their respective attorneys, move the Court pursuant to Local Rule 54.3 for entry of an Order approving an agreement between the parties for payment of Plaintiffs’ attorneys’ fees by CHA to Impact For Equity (“IFE”), formerly known as Business and Professional People for the Public Interest (“BPI”) now known and doing business as Impact For Equity (“IFE”). The agreement covers the period following the Court’s most recent fee award, beginning January 1, 2021 and ending December 31, 2022.

In support of this Motion, the parties state as follows:

1. The last award of attorneys' fees to plaintiffs in this case, by this Court's order of September 29, 2021, was for work performed between February 23, 2019, the date upon which the Settlement Agreement in this case became effective, and December 31, 2020.

2. The Settlement Agreement approved by this Court's order of January 23, 2019, provides that the Plaintiffs may seek attorneys' fees for monitoring and enforcing the Agreement.

3. On August 23, 2023, Plaintiffs submitted to CHA a fee request pursuant to Local Rule 54.3 requesting fees for work performed by the Plaintiffs' legal team in monitoring and enforcing the Settlement Agreement, in the sum of \$241,343.75, as follows:

|                  | <u>Hours</u>     | <u>Rates</u> | <u>Total</u>        |
|------------------|------------------|--------------|---------------------|
| A. Polikoff      | 4.25 hours       | \$725        | \$3081.25           |
| J. Brown         | 294.25 hours     | \$625        | \$183,906.25        |
| Cara Hendrickson | 21.50 hours      | \$600        | \$12,900.00         |
| Ashton Hoselton  | 26.00 hours      | \$375        | \$9750.00           |
| Amy Thompson     | 64.25 hours      | \$375        | \$24,093.75         |
| Ashley Meeder    | 21.75 hours      | \$350        | \$7612.50           |
| <b>Total</b>     | <b>432 hours</b> |              | <b>\$241,343.75</b> |

The rates requested were the same as rates approved by the Court in the prior fee award for those with comparable experience. The request also included an additional amount for fee preparation time of over \$12,500, based on the rates listed above, the precise amount of which was to be determined upon resolution of the base fee amount.

4. Pursuant to Local Rule 54.3, the parties conferred in an attempt to reach agreement on the amount of fees. As a result of those discussions, the parties did reach agreement and CHA agreed to pay \$243,000.00 to IFE following approval by the Court.

5. In light of the parties' agreement, as indicated by Local Rule 54.3(f), this motion does not include supporting evidentiary materials. However, Plaintiffs stand ready to submit time records, affidavits and any other supporting material the Court may request.

WHEREFORE, Plaintiffs and CHA respectfully request entry of an order approving the parties' agreement respecting payment of attorneys' fees of \$243,000.00 for work performed during the period from January 1, 2021, through December 31, 2022. For the Court's convenience, a proposed draft order is attached hereto.

Respectfully Submitted,

By: /s/ Elizabeth M. Silas  
Elizabeth M. Silas  
One of the Attorneys for the Defendant

By: /s/ Julie Elena Brown  
Julie Elena Brown  
One of the Attorneys for the Gautreaux Plaintiffs

November 28, 2023

Cara Hendrickson  
Julie Elena Brown  
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|  | ) |                      |
| Defendant.                                 | ) |                      |
|  | ) |                      |

**AGREED ORDER**

This matter coming to be heard on the Joint Motion of Plaintiffs and Defendant Chicago Housing Authority ("CHA") for an Order Approving an Agreement of the Parties Respecting Payment of Plaintiffs' Attorneys' Fees, and, based on the submissions of the parties, the Court finding that the agreement of the parties is reasonable,

IT IS HEREBY ORDERED:

The Court approves the agreement of the parties respecting payment by CHA to Impact for Equity (formerly Business and Professional People for the Public Interest) of Plaintiffs' attorneys' fees in the amount of \$243,000.00 for work performed during the period January 1, 2021, through December 31, 2022.

\_\_\_\_\_  
Marvin E. Aspen, Judge

\_\_\_\_\_, 2023